

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

BEVERLY CLARK, JESSE J. PAUL,)	DOCUMENT ELECTRONICALLY
WARREN GOLD, LINDA M.)	FILED
CUSANELLI, CAROLE L.)	
WALCHER, and TERRI L.)	Honorable Dickinson R. Debevoise
DROGELL, on behalf of themselves)	Civil Action 08-6197 (DRD-MAS)
and all others similarly situated,)	
)	
Plaintiffs,)	
)	Motion Return Date: April 18, 2011
v.)	
)	
THE PRUDENTIAL INSURANCE)	ORAL ARGUMENT REQUESTED
COMPANY OF AMERICA, a New)	
Jersey corporation,)	
)	
Defendant.)	

**NOTICE OF MOTION TO APPEAL THE MAGISTRATE JUDGE'S
MARCH 1, 2011 ORDER WITH RESPECT TO PLAINTIFFS'
CHALLENGES TO DEFENDANT'S CONFIDENTIALITY
DESIGNATIONS**

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on behalf of themselves and all others similarly situated*

To: All Counsel of Record

PLEASE TAKE NOTICE that Plaintiffs Beverly Clark, Jesse J. Paul, Warren Gold, Linda M. Cusanelli, Carole L. Walcher, and Terri L. Drogell ("Plaintiffs") shall move this Court, before the Honorable Dickinson R. Debevoise, U.S.D.J., on April 18, 2011 or as soon thereafter as counsel may be heard,, for an Order granting Plaintiffs' Motion to Appeal the Magistrate Judge's March 1, 2011 Order with Respect to Plaintiffs' Challenges to Defendant's Confidentiality Designations. This motion is based on (1) Plaintiffs' Memorandum in Support of Plaintiffs' Motion to Appeal the Magistrate Judge's March 1, 2011 Order with Respect to Plaintiffs' Challenges to Defendant's Confidentiality Designations; (2) the parties' October 19, 2010 Joint Letter Brief submitted to Magistrate Judge Shipp; (3) the Compendium of Documents Subject to Challenge; (4) the Compendium of Supporting Documentation; and (5) and all other pleadings and papers of record on file in this action. Also enclosed herewith for the Court's consideration is a proposed form of Order.

Dated: March 15, 2011 Respectfully submitted,
NAGEL RICE LLP

By: 

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